

SHER TREMONTE LLP

October 31, 2023

BY ECF

Hon. Taryn A. Merkl
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Trooper 1 v. NYSP et al.*, 22-cv-893 (LDH) (TAM)

Dear Judge Merkl:

We represent Governor Cuomo in the above-referenced matter and write jointly with counsel for Plaintiff Trooper 1 and counsel for the New York State Police (“NYSP”) regarding the status of the Parties’ meet and confer process regarding the narrowing of Plaintiff’s case as discussed at the September 26, 2023 conference. While counsel for Trooper 1 and Governor Cuomo have met and conferred in good faith multiple times regarding the matters discussed at the conference, we have not been able to reach any agreement on narrowing the scope of Plaintiff’s case, Governor Cuomo’s defenses, or narrowing any discovery issues related to the nonparty complainants.

In light of this, we respectfully request that the Court schedule another status conference to discuss the deadline to complete discovery.

Respectfully submitted,

/s/ Theresa Trzaskoma

Theresa Trzaskoma